**Brownfield Cleanup Grant Work Plan**
**Water Street Redevelopment Project, Area of Concern #5**
**Department of Planning & Development**
**Ypsilanti, Mich.**

Grant Recipient: City of Ypsilanti
One South Huron Street
Ypsilanti, Michigan 48197

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Project Period: October 1, 2009-September 30, 2012

The site is contaminated with hazardous substances. The site has a long history of industrial use since 1927, including truck manufacturing, automotive parts manufacturing, trucking terminal, and scrap recycling. The site currently is vacant awaiting redevelopment as part of the Water Street Redevelopment Project. Polychlorinated biphenyls (PCB) contamination is present on a large portion of the roof and other areas of the building posing an immediate threat to human health and the environment; the PCB contamination resulted from vandalism of PCB electrical equipment prior to the City of Ypsilanti taking control of the property. Elevated levels of arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, and polycyclic aromatic hydrocarbons in soil and groundwater across the entire 7.5-acre site also pose additional threats to human health and the environment via human direct contact and/or groundwater migration to surface water pathways. The project period is for three years.

**Proposed Outputs and Outcomes:**

The primary expected output is the following: The grant funds will be used to continue environmental remediation for the City of Ypsilanti's Water Street Redevelopment Project, specifically Area of Concern #5 which 7. 5 acres located 103 S. River Street.The goal of the cleanup will be to remove the building and properly dispose of PCB-contaminated materials.

The expected outcome is redevelopment of the City's Water Street Project, a 38-acre site on the Huron River at the eastern edge of the historic downtown district. The planned project is a sustainable, mixed use redevelopment of an assemblage of 40 parcels of contaminated land that formerly housed industrial and commercial facilities since before the turn of the 20th century. It will be a model of transformational brownfield redevelopment and a catalyst for Ypsilanti's rebirth. The project was initiated in 1997, but only began to come to fruition in 1999 after Ypsilanti was awarded an EPA Brownfield Assessment Grant. That

funding allowed the City to conduct environmental testing, develop compatible cleanup and site use plans, and conduct a market study for the project. Since 1999 the city has held design charrettes, developed a site master plan, conducted additional environmental assessments and due diligence, acquired the properties, and conducted limited building demolition and environmental cleanup to remove imminent threats to public health and welfare The City's Master Plan a mixture of residential, retail, entertainment, and commercial/office spaces, and other compatible uses, as well as a riverfront linear park and trail.

## I. Introduction and Environmental Results

The contaminants of concern, PCBs, were released to the roof of the site building during vandalism of roof-mounted transformers before the City took control of the site. Although steps were taken to minimize migration of PCBs after discovery, subsequent assessment results and visible staining indicate that rain events prior and subsequent to initial response actions spread the contamination to a large portion of the roof. Visible staining also indicates that contamination has migrated to other building materials, such as concrete block walls, and likely has migrated through the dilapidated roof structure to interior portions of the building.

The goal of the cleanup will be to remove the building and properly dispose PCB-contaminated materials. Previously identified contamination hot spots will be delineated to define the extent of impact to building materials. A demolition/deconstruction and disposal plan then will be developed. The goal of the plan will be to ensure removal and proper disposal of all PCB-contaminated building components while maximizing the amount of the building that can be sustainably deconstructed for reclamation and reuse of building fixtures, components, and materials. In consideration of community health and safety, it will not be feasible to only remove contaminated portions of the building and leave the partially demolished carcass in place. Project partner Recycle Ann Arbor or a similar agency will work with the remediation contractor to deconstruct the uncontaminated portions of the building.

## II. Project Overview

The U.S. EPA has awarded the City of Ypsilanti (COY) $200,000 for the cleanup of hazardous substances at the property. The following tasks comprise COY's Cleanup Grant project:

1. Site Specific Community Involvement
2. Planning for Clean Up
3. Remediation of PCB Contaminated Building Components
4. Soil Remediation
5. Remediation Verification and Reporting

## III. Management and Coordination

Ms. April McGrath of COY will be the Project Manager for this grant with assistance from the Washtenaw County Brownfield Redevelopment Authority. COY regularly retains the services of environmental consultants to conduct assessments, determine the need for cleanup, prepare cleanup plans and conduct cleanups at their redevelopment sites. Ms. McGrath and COY's retained consultants will work with the COY staff in overseeing the cleanup.

## IV. Work to be Performed

The schedule presented in the task tables below assumes that the cooperative agreement with the U.S. EPA will be executed by September 30, 2012.

### TASK 1: SITE-SPECIFIC COMMUNITY INVOLVEMENT:

Involvement of key stakeholders and the general public is the hallmark of a successful Brownfield initiative and the City has performed extensive public engagement over the course of the Water Street redevelopment project The City will update the public on the project's progress and solicit input at key decision points through community outreach meetings, press releases, and the City's website, with significant opportunity for public interaction. Community outreach and involvement activities will include the following:

- coordinating and conducting meetings with stakeholders and the general public,
- seeking, discussing and implementing meaningful public input into the grant processes,
- preparing and publishing public notices,
- preparing meeting materials and presentations,
- preparing and distributing display boards, brochures and other public information materials.

| **Task 1: Conduct Community Involvement**<br>Narrative: The Community will be informed of the cleanup plans and given a chance to comment on the cleanup plans | | |
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| **Activities:** | **Deliverables:** | **To be Completed by:** |
| a. Public meeting with neighborhood residents and project partners about the clean up plans. | Report on meeting in EPA quarterly reports, provide list of attendees. | July 30, 2009 |
| b. Publish public notice of proposed cleanup in local web site and issue a press release | Copy of public notice included in EPA quarterly reports. | To coincide with public meeting. |
| c. Hold public comment period (21-30 days) and respond to substantial comments. | Summary of relevant comments and responses in quarterly reports. | Ends 21-30 days after public notice is published. |
| d. Inform public of cleanup progress and results. | Summary provided in EPA quarterly reports | Ongoing for duration of project. |

**Task 2: Cleanup Planning**

The first cleanup task in the proposed project will be for the retained environmental consultant to characterize and delineate the extent of demolition required to remove all PCB-contaminated materials. The consultant then will prepare a Remediation Work Plan for removal and disposal of PCB-contaminated materials in accordance with TSCA and state requirements. The consultant will assist city staff in preparing bid plans and specifications for selection and retention of a remediation/demolition contractor(s). Bids will be solicited and the lowest cost, qualified contractor will be retained. Appropriate agreements with Recycle Ann Arbor, a project non-profit partner for deconstruction of the uncontaminated portions of the site building, also will be developed. Task outcomes will include a Remediation Work Plan delineating PCB remediation and deconstruction areas of the building, selection of a PCB remediation contractor, and executed contracts with Recycle Ann Arbor and a remediation contractor.

| Task 2: Clean up Planning | | |
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| **Activities** | **Deliverables** | **To be Completed by** |
| a. Select Environmental Consultant from City's Pre-selected Environmental Consultant Panel and establish contract for the EPA grant work with the selected consultant. | Name of consultant in EPA quarterly report | June 30, 2009 |
| b. Prepare plans and specs for bids for excavation contractors, and subcontractors. | Bid contract scheduled for publication | July 30, 2009 |
| c. Advertise for bid and obtain bids for contractors. | List of publications used for the bid | August 1, 2009 |
| d. Award contract to construction contractor and subcontractors. | Identity of contractors | September 15, 2009 |
| f. prepare a remediation work plan | Give EPA copy of report | October 15, 2009 |

**Task 3: Remediation of PCB Contaminated Building Components**
The first site response action will be careful removal of PCB-contaminated materials from the building. Those materials will be segregated according to PCB content and regulatory requirements and transported for disposal in a properly licensed disposal facility. Materials will be disposed in a TSCA disposal facility or a licensed municipal solid waste landfill as appropriate for the levels of PCB contamination and regulatory requirements. The buildings have been assessed for asbestos-containing materials (ACM), and limited quantities of ACM have been identified in the three buildings. Prior to removal of PCB-contaminated materials, the remediation contractor or its subcontractor, will remove the ACM. The task outcome will be removal and proper disposal of all PCB-contaminated materials.

| Task 3: Remediation of PCB Contaminated Building Components | | |
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| **Activities** | **Deliverables** | **To be Completed by** |
| a. Revise the remediation work plan as necessary based upon public comments and Michigan Department of Environmental Quality (MDEQ) approval letter. Obtain revised approval, if necessary. | Final work plan sent to EPA. | October 15, 2009 |
| c. Prepare Health and Safety Plan | Health and Safety Plan sent to EPA | October 15, 2009 |
| d. Prepare Action Memo for cleanup | Draft and executed Action Memos | October 15, 2009 |
| e. Notify EPA when cleanup starts. | E-mail to EPA | Within one day of start of cleanup. |
| f. Conduct Cleanup | None – Selected environmental consultant oversees cleanup. | November 30, 2009 |
| g. Notification of cleanup completion | One page memo to EPA | Within one month of end of cleanup. |
| h. Prepare remediation Implementation Report for hazardous substances. | Remediation Implementation Report | December 30, 2009 |

## Task 4: Building Deconstruction and Demolition

After removal of PCB-contaminated building materials, the remaining above-slab building components will be removed by deconstruction and demolition. Where feasible, portions of building removal will be through deconstruction by Recycle Ann Arbor or a similar entity. Deconstruction provides for sustainable reclamation and reuse of as many building materials and components, such as bricks, doors, lighting fixtures, etc., as possible and recycling of other materials such as structural steel, other metals, and concrete. The uncontaminated portions of the existing concrete slab will be left in pace as a cap to potential underlying soil contamination until additional cleanup funds become available. The outcome of this task will be deconstruction of the uncontaminated portions of the building.

| Task 4: Building Deconstruction and Demolition | | |
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| **Activities** | **Deliverables** | **To be Completed by** |
| a. Deconstruct and demolition of the uncontaminated portion of the building | Report to EPA | December 30, 2009 |
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**Task 5: Remediation Verification and Reporting**

PCB remediation will be guided and documented through the collection and analysis of remediation verification samples. During remediation, analysis results will help determine completion points in accordance with remediation goals. After all remediation is complete, the effectiveness of response actions and levels of residual contamination, if any, will be documented. The frequency, spacing, and analysis parameters for all remediation verification sampling and analyses will be selected in accordance with requirements for a TSCA-compliant cleanup and/or guidance published by the Michigan Department of Environmental Quality (MDEQ) for the Michigan Voluntary Cleanup Program (VCP), as appropriate. At the conclusion of all environmental response actions, the field activities, types of remediation, quantities of materials remediated, and results of verification sampling will be documented in a project report prepared in accordance with regulatory requirements. The outcome of this task will be a final report documenting the environmental response actions conducted on the site.

| Task 5: Remediation Verification and Reporting as required by the EPA | | |
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| **Activities** | **Deliverables** | **To be Completed by** |
| a. Prepare Quarterly Reports | Quarterly Reports | Within 30 days of end of each quarter: April 31, July 31, October 31, January 31. |
| b. Prepare Annual Financial Reports. | Annual Financial Reports | October 31 of each year |
| c. Prepare Annual MBE/WBE Report | Annual MBE/WBE Report | October 31 of each year. |

## V. Budget

**Budget – Hazardous Substances Cleanup – 34, 38 and 40 E. Michigan Avenue and 14 N. River Street, City of Ypsilanti**

| Budget Categories **(programmatic costs only)** | Tasks | | | | | |
|---|---|---|---|---|---|---|
| | Task 1 Community Engagement | Task 2 Cleanup Planning | Task 3 PCB Removal and Disposal | Task 4 Building Deconstruction | Task 5 Remediation Verification and Reporting | Total Grant Budget |
| **Personnel** | | | | | | |
| **Fringe Benefits** | | | | | | |
| **Travel** | **$200** | | | | | $ 200 |
| **Equipment** | | | | | | |
| **Supplies** | **$700** | | | | | $ 700 |
| **Contractual** | **$1,600** | **$10,000** | **$115,000** | **$60,000** | **$12,500** | $199,100 |
| **Other** | | | | | | |
| Total Grant | $2,500 | $10,000 | $115,000 | $60,000 | $12,500 | $200,000 |

**Task 1: Site-Specific Community Involvement**:

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| Community Outreach: | **$7,500** |
| City Labor will be in-kind | $5,000 |
| Project Environmental Consultant | $1,600 |
| Printing, publishing and mailing notices | $ 700 |

**Task 2: Clean up Planning:**

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| Preparing for a Request for Qualifications: In-kind labor costs from COY | $5,000 (in-kind) |
| A written clean up plan and Request for Bid for remediation process | $10,000 (consultant fees) |

**Task 3: PCB Removal and Disposal**

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| Total | $115,000 |
| Environmental Consultant For monitoring of remediation | $5,000 |
| Removal and disposal of PCB | $110,000 |

**Task 4: Building Deconstruction**

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| Building deconstruction | $60,000 |

**Task 5: Remediation Verification and Reporting**

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| **Total** | **$12,500** |
| Sample Testing (50 samples @$100 each) | $ 5,000 |
| Final Report | $7,500 |